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## CITY OF CAMBRIDGE

Community Development Department

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**SUSAN GLAZER**

*Acting Assistant  
City Manager for  
Community Development*

February 11, 2011

Mark Sylvia, Commissioner  
Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

Re: Comments on Commercial Building Energy Rating White Paper

Dear Commissioner Sylvia:

The City of Cambridge submits the following comments on the white paper prepared by your agency titled *An MPG Rating for Commercial Buildings*. We would like to commend you and your staff for the work in developing the concept and proposal for a pilot project on this issue. The City appreciates the opportunity to have participated on the NGA Team and looks forward to working with DOER on the pilot.

Energy use in buildings, particularly in the commercial and institutional sectors, is the primary source of greenhouse gas emissions in Cambridge. Based on past inventories, about 80 percent of the city's GHG emissions result from energy use in existing buildings and about two-thirds of total emissions are attributed to the commercial and institutional sector (large multi-family residential buildings are included in this sector as well). Therefore, if Cambridge is to achieve reductions of GHG emissions, we must address energy use in buildings.

The Climate Protection Action Committee, the standing advisory committee to the City Manager on climate policy and actions, has recommended that the City develop a building energy labeling program for commercial and institutional buildings. While the committee was inspired by the operational rating requirements established in Washington, DC and New York City, DOER's proposal to develop a labeling program based on both asset and operational ratings is attractive. There are some issues that need to be evaluated and worked out. Among these issues are:

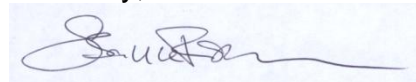
- The cost of assessing building assets could be a constraint. The challenge is to develop an assessment process that is technically rigorous and reliable but not financially burdensome to building owners.

- The building assessment process needs to consider the as-built conditions in a building, not just the design. We have seen LEED-certified buildings that did not perform as designed due to flaws in construction.

Cambridge agrees with DOER that the ultimate goal of a rating and labeling program is to motivate owners of existing buildings to retrofit their properties to achieve higher energy performance. Significant opportunities to improve energy performance in existing buildings are not being pursued by owners due to the lack of awareness of energy use and competing organizational priorities. We believe that a rating and labeling system is critical to making energy performance in buildings visible and important. We also believe that it will encourage a whole building perspective that seems to be mostly lacking in current energy efficiency efforts.

The City supports the development of the voluntary pilot program to further refine DOER's concepts and test them in the field. We look forward to working with DOER on the pilot program and to recruiting buildings owners to participate.

Sincerely,

A handwritten signature in blue ink, appearing to read "Susanne Rasmussen", is placed over a light blue rectangular background.

Susanne Rasmussen  
Director of Environmental  
& Transportation Planning